

# Inaccurate Criticisms of CWIFP in 2026 White House Budget Request

May 4, 2025 Version 1.0

The 2026 White House Budget Request makes inaccurate criticisms of the USACE's Corps Water Infrastructure Financing Program (CWIFP) as the rationale for eliminating the Program. This one-pager responds on a line-by-line basis.

## ***The Corps WIFIA program provides direct loans and loan guarantees for non-Federal dam safety projects.***

- CWIFP is not statutorily limited to loans for non-Federal dam safety projects. The Program's intended use was to finance non-Federal cost shares in USACE, BOL and other Federal projects. Such cost shares use local funding (for debt repayment) and reduce Federal outlays.
- CWIFP is erroneously prevented from financing non-Federal cost-shares by the 2020 WIFIA FCRA Criteria. These Criteria are demonstrably incorrect and inconsistent with FCRA principles. OMB should correct or delete the Criteria to allow CWIFP to fulfill its statutorily intended purpose.

## ***The Budget eliminates this program because there is no demonstrated need in the private market for Federal financial assistance for these types of projects.***

- WIFIA and TIFIA are similar loan programs that lend to high-quality borrowers that also have cost-effective access to private debt markets. Yet both Programs have become highly successful by offering loan features that clearly fulfill needs not met by private markets.
- CWIFP received at least 18 qualifying applications in its first solicitation. Again, there is clear evidence of demand, despite limitations imposed by the WIFIA FCRA Criteria.

## ***In addition, the program is duplicative of other programs, such as FEMA's National Dam Safety Program and the EPA's WIFIA Program.***

- It is inconsistent to assert 'there is no demonstrated need' for CWIFP capacity and then say that that capacity is provided by other programs. If there is no 'need', why is 'duplication' relevant?
- CWIFP, per statutory framework, is an extension of the WIFIA Program. WIFIA specializes in municipal water agency projects. CWIFP would, if allowed, specialize in non-Federal cost-shares in large water management projects (e.g. levees, flood control, etc.). The water infrastructure sub-sectors are sufficiently different to benefit from specialization.

## ***In addition, this program is arguably outside of the Corps' mission, which is to provide engineering expertise for military construction and civil works projects—not serve as a creditor to private entities.***

- The exact same is true for WIFIA (EPA), TIFIA (DOT), or other federal finance programs located in sectoral agencies. Why is CWIFP being singled out?
- In ideal world, federal infrastructure finance should be centralized. But as it is, location at sectoral agencies is relatively efficient.